

REMARKS

Claims 1, 3, 12, 13, 15, 17-22, 25, 32, 40-42, 59, 62, 63, 71 and 96-98 were pending in this application. In the Office Action, claims 1, 3, 12, 13, 15, 17-22, 25, 32, 40-42, 59, 62, 63, 71 and 96-98 were rejected.

Claims 1, 21, 59, 96 and 97 are hereby amended. No claim is added or cancelled herein.

Reconsideration of this application as amended, and allowance of all pending claims 1, 3, 12, 13, 15, 17-22, 25, 32, 40-42, 59, 62, 63, 71 and 96-98 are hereby respectfully requested.

Supplemental Information Disclosure Statement

A Supplemental Information Disclosure Statement including references for consideration is submitted herewith. The Examiner is requested to indicate consideration of these references in the next communication to Applicant.

Double Patenting

Claims 1 and 59 were provisionally rejected on the ground of nonstatutory obviousness-type double patenting as being unpatentable over claims 1 and 34 of copending Application No. 10/800,473 in view of U.S. Patent No. 6,985,478 to Pogossiants et al. ("Pogossiants"). Applicant submits herewith a terminal disclaimer to obviate the double patenting rejection. Therefore, withdrawal of this rejection is respectfully requested.

Rejections under 35 U.S.C. §112, Second Paragraph

Claims 21, 96 and 97 were rejected under 35 U.S.C. § 112, second paragraph. Specifically, claim 21 were rejected for reciting the limitation of “the networking for managing inmates” which lacks antecedent basis; and claims 96 and 97 were rejected for reciting the limitation of “The system of claim 1” which lacks antecedent basis. Claim 21 is hereby amended to recite “the networking device for managing inmates.” Claims 96 and 97 are hereby amended to recite “The platform of claim 1” Claims 21, 96 and 97 no longer recite any elements that lack antecedent basis. Therefore, this rejection is overcome in view of the amendment.

Rejection under 35 U.S.C. §103(a)

A. Claims 1, 3, 12, 13, 15, 17, 19, 20, 32, 40-42, 59, 62, 63 and 96-98

Claims 1, 3, 12, 13, 15, 17, 19, 20, 32, 40-42, 59, 62, 63 and 96-98 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Pogossiants. This rejection is respectfully traversed.

Independent claim 1 specifically recites:

. . . a networking device connected via digital data links to call processing gateways at the multiple prison facilities, at least one of the multiple prison facilities located remotely from the call processing platform, each of the multiple prison facilities including multiple telephone terminals, the networking device receiving or sending data packets converted from or into call signals at the call processing gateways;

an unauthorized call activity detection system connected to the networking device for detecting three-way call activity associated with calls placed using one or more of the multiple telephone terminals; and

a call application management system connected to the networking device and the unauthorized call activity detection system for processing and transmitting the calls from the multiple telephone terminals to a first telephone carrier network. (Emphasis added).

The call processing platform of claim 1 includes a networking device, an authorized call activity detection system and a call application management system. The networking device connects to call processing gateways at the multiple prison facilities via digital data links. The unauthorized call activity detection system detects three-way call activity associated with calls placed using telephone terminals in the prison facilities. A call application management system processes and transmits calls from the telephone terminals in the prison facilities.

The feature of “a networking device connected via digital data links to call processing gateways at the multiple prison facilities” is advantageous because various call processing activities including detection of unauthorized call detection may be performed at the call processing platform. The multiple prison facilities need not include components for such call processing activities, and therefore, the cost associated with the call processing activities may be reduced.

Pogossiants fails to disclose this feature. In Pogossiants, the TS server 95 is not connected to call processing gateways at multiple facilities. As shown in Figure 5, the TS server 95 in the PSTN 13 is associated with one call center 93. Although Pogossiants describes using T-Server control to perform load balancing between call centers (see Pogossiants, col. 12, ll. 20-23) or to distribute calls over a wide geographic region with many call centers (see Pogossiants, col. 12, ll. 37-45), T-Server control appears to be performed by the bridge 87 and not the TS server 95. For example, the paragraph about the distribution of calls over many call centers states that many bridges distributed over different geographic

locations are used to distribute the calls. See Poggosiants, col. 12, ll. 37-45. Therefore, the control of load or distribution of calls appears to be achieved by many bridges and not by a centralized TS server 95. In other words, Poggosiants does not appear to disclose a central TS server that is connected to multiple call centers to distribute or control load of the calls between the call centers. In contrast, each TS server 95 in the PSTN 13 appears to be connected to another TS server 95 in a *single* call center 93. The control of individual TS servers 95 appear to be performed by the multiple bridges. Therefore, Poggosiants fails to disclose the feature of “a networking device connected via digital data links to call processing gateways at the multiple prison facilities” as recited in claim 1, as amended.

Further, the feature of “an unauthorized call activity detection system connected to the networking device for detecting three-way call activity associated with calls placed using one or more of the multiple telephone terminals” is advantageous because three-way calls may be detected at the call processing platform without having to provide an unauthorized call activity detection systems at each prison facility.

Poggosiants fails to disclose the feature of “an unauthorized call activity detection system connected to the networking device for detecting three-way call activity associated with calls placed using one or more of the multiple telephone terminals” as recited in claim 1, as amended. In Poggosiants, a switching entity (SWE) sends notification to a call control entity (CCE) about the success or failure of transport protocol negotiation for calls. See Poggosiants, col. 21, ll. 59-60. After a connection is established, the CCE may issue a Hang-up request to drop the connection. See Poggosiants, col. 22, ll. 2-7. The Hang-up request appears to be generated responsive to hang-up of a call by a recipient or a caller, and not in response to detection of any three-way call activity. Nowhere in Poggosiants does it

disclose that the Hang-up request is issued in response to detection of three-way call activity. Further, Pogossiants does not disclose any components for performing three-way call detection. Therefore, Pogossiants fails to disclose the feature of “an unauthorized call activity detection system connected to the networking device for detecting three-way call activity associated with calls placed using one or more of the multiple telephone terminals” as recited in claim 1, as amended.

Therefore, claim 1, as amended, is patentably distinguishable over Pogossiants at least for reciting the features of (i) “a networking device connected via digital data links to call processing gateways at the multiple prison facilities” and (ii) “an unauthorized call activity detection system connected to the networking device for detecting three-way call activity associated with calls placed using one or more of the multiple telephone terminals.”

Claims 3, 12, 13, 15, 17, 19, 20, 32, 40-42, 96, and 97 depend from claim 1. Therefore, the same arguments set forth above for claim 1 are equally applicable to claims 3, 12, 13, 15, 17, 19, 20, 32, 40-42, 96, and 97. Accordingly, claims 3, 12, 13, 15, 17, 19, 20, 32, 40-42, 96, and 97 are also patentably distinguishable over Pogossiants.

Claim 19 is patentable for the additional reason that it recites the feature of “a billing system connected to said call application management system for providing real-time call accounting.” Pogossiants merely discloses bill collection or credit analysis being handled via COST telephony. Pogossiants does not specifically describe where the bill collection or credit analysis is being handled. Nowhere in Pogossiants does it disclose that the bill collection or credit analysis is being performed in a system or component corresponding to the call processing platform. Therefore, claim 19 is patentably distinguishable from

Pogossiants also for reciting the feature of “a billing system connected to said call application management system for providing real-time call accounting.”

Independent claim 59 also recites the features of “connecting with call processing gateways at the multiple prison facilities” and “detecting unauthorized three-way call activity associated with the calls.” Therefore, arguments set forth above for claim 1 are equally applicable to claim 59 and its dependent claims 62, 63 and 98.

B. Claims 18 and 71

Claims 18 and 71 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Pogossiants in view of U.S. Patent No. 6,320,948 to Heilmann et al. (“Heilmann”). This rejection is respectfully traversed.

Claim 1, as amended, recites the features of “a networking device connected via digital data links to call processing gateways at the multiple prison facilities” and “an unauthorized call activity detection system connected to the networking device for detecting three-way call activity associated with calls placed using one or more of the multiple telephone terminals.” As set forth above, Pogossiants fails to disclose these features. Neither does Heilmann disclose these features. Heilmann was cited in the Office Action merely for allegedly disclosing a call recording system. Nowhere in Heilmann does it disclose any networking device connected to multiple prison facilities or any component for detecting three-way call activity.

Claim 18 depends from claim 1. Therefore, claim 18 is also patentably distinguishable from Pogossiants and Heilmann for the same reasons as set forth above for claim 1.

Similarly, claim 59 recites the features “connecting with call processing gateways at the multiple prison facilities” and “detecting unauthorized three-way call activity associated with the calls.” Claim 71 depends from claim 59, and therefore, the same arguments set forth above for claim 1 are equally applicable to claim 71.

C. Claims 21, 22, and 25

Claims 21, 22 and 25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Pogossiants in view of U.S. Patent No. 7,333,798 to Hodge (“Hodge”). This rejection is respectfully traversed.

Claim 1 recites the features of “a networking device connected via digital data links to call processing gateways at the multiple prison facilities” and “an unauthorized call activity detection system connected to the networking device for detecting three-way call activity associated with calls placed using one or more of the multiple telephone terminals.” As set forth above, Pogossiants fails to disclose these features. Neither does Hodge disclose these features. Hodge was cited in the Office Action for allegedly disclosing a justice application management system. Nowhere in Heilmann does it disclose any network connected to multiple prison facilities or any component for detecting three-way call activity.

Claims 21, 22 and 25 depend from claim 1. Therefore, the same arguments set forth above for claim 1 are equally applicable to claims 21, 22 and 25.

Applicant submits that claims 1, 3, 12, 13, 15, 17-22, 25, 32, 40-42, 59, 62, 63, 71 and 96-98 are distinguishable over the cited references for at least the reasons set forth above. Therefore, withdrawal of these rejections is respectfully requested.

Conclusion

It is submitted that all pending claims 1, 3, 12, 13, 15, 17-22, 25, 32, 40-42, 59, 62, 63, 71 and 96-98, as amended, are in condition for allowance. Favorable action is solicited.

Respectfully Submitted,
Robert Rac

Date: January 6, 2009

By: /Dohyun Ahn/
Dohyun Ahn, Reg. No. 63,237
FENWICK & WEST LLP
801 California Street
Mountain View, CA 94041
Phone: (650) 335-7291
Fax: (650) 938-5200